

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com

Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com

*Attorneys for Irving H. Picard, Esq. Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
And Bernard L. Madoff*

Hearing Date and Time:
February 4, 2010 at 10:00 am

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

NOTICE OF FILING OF AMENDED PROPOSED PROTECTIVE ORDER

PLEASE TAKE NOTICE THAT Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS” or “Debtor”) and Bernard L. Madoff (“Madoff”), by and through his undersigned attorneys, files herewith an amended proposed Protective Order in connection with the Motion

for Entry of a Protective Order (the “Motion”)¹ previously scheduled to be heard by the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, the Alexander Hamilton United States Customs House, One Bowling Green, New York, New York 10004, on January 14, 2010, which hearing was adjourned and is currently scheduled to be heard on February 4, 2010 at 10:00 a.m.

A redlined version of the Protective Order, illustrating the changes thereto since the filing of the Motion, is attached hereto as Exhibit A. A clean copy of the Protective Order is attached hereto as Exhibit B. The revisions made to the Protective Order since the filing of the Motion reflect the Trustee’s negotiations with various constituents. The Trustee believes that the concerns raised by these parties have been addressed in the revised draft and, as such, the Trustee is not aware of any remaining opposition to the entry of the Protective Order.

Dated: New York, New York
February 3, 2010

BAKER & HOSTETLER LLP

By: s/Marc E. Hirschfield

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com

*Attorneys for Irving H. Picard, Esq. Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC And Bernard L.
Madoff*

¹ All capitalized terms used and not otherwise defined herein shall have the meaning ascribed to those terms in the Motion.